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13 Attorneys for Defendant
14 SALVADOR GUDINO CHAVEZ (11)

15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF WASHINGTON

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 v.

20 SALVADOR GUDINO CHAVEZ,

21 Defendant.

CASE NO.: 4:15-CR-6049-EFS-11

MOTION FOR EXTENSION OF TIME
TO FILE SENTENCING DOCUMENTS

22 Defendant, SALVADOR GUDINO CHAVEZ (11) (hereinafter referred to as
23 “Defendant”), by and through counsel, Lupe C. Rodriguez, Jr. of the Law Office of Lupe
24 Rodriguez, Jr. APC and local counsel Timothy Scott, of Scott Trial Lawyers, submits the
25 following Motion for Extension of Time to File Sentencing Documents.

26 Defendant entered a plea of guilty on May 8, 2018. The Sentencing is currently set
27 for March 11, 2019. The Court’s Order requires a review of the Presentence Investigation
28 Report (PSR) and all sentencing motions and memorandums to be filed within 14 days of
the disclosure of the draft PSIR. (ECF 1022). The PSIR was filed on November 19, 2019.

1 Defense counsel suffered a family emergency which required the continuance of
 2 the sentencing hearing in this case and which has taken much of Defense counsel's time
 3 since October 2018 to the present. As such, Defendant is respectfully requesting an
 4 extension of time until February 25, 2019, in order to file the above referenced sentencing
 5 related documents. Defense counsel has discussed this schedule with counsel for the
 6 Government in this cause. Counsel for the Government has no objection to this request.

7 Law Office of Lupe Rodriguez, Jr. APC

8 Dated: February 21, 2019

s/Lupe Rodriguez, Jr.
 Lupe C. Rodriguez, Jr.
 Attorney for Defendant
 Salvador Gudino Chavez (11)

12 Dated: February 21, 2019

s/Timothy Scott
 Timothy Scott
 Associated Local Counsel and
 Attorney for Defendant
 Salvador Gudino Chavez (11)

17 CERTIFICATION

18 I hereby certify that on February 21, 2019, I electronically filed the foregoing with
 19 the Clerk of the Court using the CM/ECF System which will send notification of such
 20 filing to the following:

21 AUSA Stephanie Van Marter, stephanie.vanmarter@usdoj.gov

s/Lupe Rodriguez, Jr.
 Lupe C. Rodriguez, Jr.
 Attorney for Defendant
 Salvador Gudino Chavez (11)